

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

**CALLIE D. ROBERTS,**

**PLAINTIFF,**

**v.**

**AAA COOPER  
TRANSPORTATION, INC., and  
MARCUS J. BUSH, Individually and  
Jointly,**

**DEFENDANTS.**

**CIVIL ACTION FILE NO.  
2:17-cv-232-RWS**

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**AAA COOPER TRANSPORTATION, INC.'S PARTIAL  
MOTION FOR SUMMARY JUDGMENT**

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COMES NOW, **AAA COOPER TRANSPORTATION, INC.**, Defendant in the above-referenced case, and files this partial summary judgment on Plaintiff's direct negligence claims, including claims for negligent retention, supervision, hiring, entrustment, and training, relying on the following:

- A.** Deposition of Marcus J. Bush. A true and correct copy of which is attached as Exhibit "A";
- B.** Marcus J. Bush's Employment Eligibility Verification. A true and correct copy of which is attached as Exhibit "B";

- C.** Record of Road Test. A true and correct copy of which is attached as Exhibit "C";
- D.** Three-Year Motor Vehicle History Report for Marcus J. Bush. A true and correct copy of which is attached as Exhibit "D";
- E.** Marcus J. Bush's Application for Employment. A true and correct copy of which is attached as Exhibit "E";
- F.** Marcus J. Bush's Three-Year Employment History obtained by AAA Cooper Transportation, Inc. A true and correct copy of which is attached as Exhibit "F";
- G.** Marcus J. Bush's Commercial Driver's License. A true and correct copy of which is attached as Exhibit "G";
- H.** Motor Vehicle Reports for Marcus J. Bush. True and correct copies of which are attached as Exhibit "H";
- I.** Check Sheet for Pre-Regular Training. A true and correct copy of which is attached as Exhibit "I";
- J.** Accident correspondence from AAA Cooper Transportation, Inc. to Marcus J. Bush. True and correct copies of which are attached as Exhibit "J";
- K.** Uniform Traffic Ticket issued to Marcus J. Bush. A true and correct copy of which is attached as Exhibit "K";

**L.** Medical Examination Report dated May 14, 2015. A true and correct copy of

which is attached as Exhibit "L"; and

**M.** Medical Examination Report dated April 30, 2013. A true and correct copy of

which is attached as Exhibit "M".

Respectfully submitted this 30th day of October, 2019.

**HALL BOOTH SMITH, P.C.**

/s/ Sean B. Cox

SCOTT H. MOULTON

Georgia Bar No. 974237

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**CERTIFICATE OF COMPLIANCE**

The foregoing **AAA COOPER TRANSPORTATION, INC.'S PARTIAL  
MOTION FOR SUMMARY JUDGMENT** is double spaced in 14 point Times  
New Roman font and complies with the type-volume limitation set forth in Local Rule  
7.1.

**HALL BOOTH SMITH, P.C.**

/s/ Sean B. Cox

SCOTT H. MOULTON  
Georgia Bar No. 974237  
SEAN B. COX  
Georgia Bar No. 664108  
DANIELL R. FINK  
Georgia Bar No. 540374  
*Counsel for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I have served a copy of the within and foregoing **AAA COOPER TRANSPORTATION, INC.'S PARTIAL MOTION FOR SUMMARY JUDGMENT** upon all parties to this matter by depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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This 30th day of October, 2019.

**HALL BOOTH SMITH, P.C.**

/s/ Sean B. Cox  
SCOTT H. MOULTON  
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SEAN B. COX  
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